

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

DENNIS GROMOV, individually and on behalf of all other similarly situated,)	
)	
Plaintiff,)	Case No. 1:22-cv-06918
)	
v.)	Hon. Franklin U. Valderrama
)	
BELKIN INTERNATIONAL, INC.,)	Magistrate Judge Gabriel A. Fuentes
)	
Defendant.)	

**JOINT MOTION TO AMEND SCHEDULING ORDER AND
STIPULATION**

The Court ordered the parties to file a status report by 5 pm on July 29, 2024, but stated that the requirement would be vacated if the parties submitted a motion and stipulation before that time with proposed modifications to the scheduling order. (ECF No. 122.) The parties therefore hereby submit a joint motion to extend the existing discovery and other deadlines as previously ordered by the Court. (*See* ECF No. 103.)

Pursuant to the Court's order (ECF No. 103), Belkin provided dates in June 2024 for the depositions of Melody Tecson (who will serve as its 30(b)(6) representative) and its former employee, Norbert von Boode. In May, the Honorable Carolyn Kuhl, who is presiding over *Lenore Miley v. Belkin International, Inc.*, Case No. 20STCV00033 (a case brought by plaintiff's counsel in the Los Angeles California Superior Court that involves similar allegations related to Belkin power banks), ordered the parties to work together to coordinate future discovery efforts in *Miley* and this action. To that end, the parties discussed a stipulation to clarify the process and procedures by which the plaintiffs in this case and in *Miley* would take additional depositions of Belkin's

witnesses. After multiple rounds of discussions, the parties agreed as indicated in the stipulation attached hereto as Exhibit 1.

The parties have agreed that Ms. Tecson's deposition and the deposition of Belkin under Rule 30(b)(6) will take place on August 15, and that Mr. Von Boode's deposition will take place on August 29.

Gromov believes that these depositions—particularly the Rule 30(b)(6) deposition—could result in the disclosure of additional information that could lead to further discovery and a further extension to complete that discovery is warranted. Belkin is not persuaded. At this time, the parties have agreed to confer further in good faith.

The parties therefore request that the Court order that current deadlines be extended as follows:

- Fact discovery closes: September 6, 2024, but the parties have agreed to meet and confer in good faith on a further extension in the event Gromov seeks additional discovery
- Rule 26(a)(2) expert disclosure deadline: November 8, 2024
- Rebuttal expert report deadline: December 13, 2024
- Expert Discovery closes: January 29, 2025

Dated: July 29, 2024

Respectfully submitted,

/s/ William F. Cash III

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